EXHIBIT I3

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	**MDL NO. 16-2738 (FLW) (LHG)**

THIS DOCUMENT RELATES TO ALL CASES

THE PLAINTIFFS' STEERING COMMITTEE'S INITIAL DESIGNATION AND DISCLOSURE OF NON-CASE SPECIFIC EXPERT WITNESSES

1. The Plaintiffs' Steering Committee ("PSC") files this Initial Designation and Disclosure of Non-Case Specific Expert Witnesses ("Designation and Disclosure") on behalf of all Plaintiffs in response to this Court's September 6, 2017 order. *See* CMO No. 9; Status Conf. Tr. pp 44-46 (Sept. 6, 2017).

2. The opinions and testimony by these expert witnesses cover, inter alia, the following fields and areas: gynecologic oncology, cell biology, epidemiology, occupational and environmental medicine, toxicology, pharmacology, geology, mineral science, genetics and regulatory affairs. The PSC reserves the right to identify experts in these and other areas beyond the specific confines of general causation, as the present structure of this litigation is focused on general causation issues only.

3. This Designation and Disclosure is intended to comply with this Court's September 6, 2017 Order requiring Plaintiffs to identify experts and the subjects on which they are going to opine only- not their expressed opinions. *See* CMO No. 9; Status Conf. Tr. pp 44-46 (Sept. 6, 2017).

4. The PSC notes that discovery in this case has not been completed. More particularly, document production has not been completed, fact depositions have not occurred, exhibits that may be used in depositions have not yet been identified and there have been no disclosures of experts by other parties to date. Accordingly, the PSC reserves the right to supplement this Designation and Disclosure as allowed by Rule 26(e) of the Federal Rules of Civil Procedure and also upon receiving additional discovery including but not limited to documents produced, fact depositions, exhibits introduced in depositions, and expert disclosures by any party.

5. Throughout this Designation and Disclosure, the term "talcum powder products" refers to Johnson & Johnson's Baby Powder and Shower to Shower products and all constituent elements of those products, including talc, asbestos, fibrous talc, and other constituent and related elements and fibers contained within.

6. Accordingly, the PSC submits the following non-case specific expert witnesses on behalf of all Plaintiffs:

A. Phillip Jay Beron, M.D.

Dr. Beron is a radiation oncologist and Associate Clinical Professor in the Department of Radiation Oncology at the David Geffen School of Medicine at UCLA. Dr. Beron is designated as an expert in the areas of cancers of the body, including gynecologic cancers, causes of cancer, including talcum powder products, cancer diagnosis, cancer effects, cancer treatments, those treatments' clinical course, associated pain and suffering from cancer, as well as the clinical practice of medicine generally. Dr. Beron is expected to provide testimony to a reasonable degree of scientific and medical certainty that the genital use of talcum powder products is a cause of ovarian cancer.

B. Paolo Boffetta, M.D., MPH

Dr. Bofetta is Professor of Medicine in Hematology and Medical Oncology, Professor of Oncological Sciences, and Professor of Environmental Medicine and Public Health at Mount Sinai School of Medicine. Dr. Bofetta is an epidemiologist with research interests in cancer epidemiology, cancer prevention, and epidemiologic methods. Most recently, he was co-author of a meta-analysis review of the current medical literature regarding genital use of talcum powder and the risk of ovarian cancer titled *Genital use of talc and risk of ovarian cancer: a meta-analysis*. Dr. Bofetta will offer opinions regarding the epidemiology of ovarian cancer following the use of talcum powder products.

C. Alan Campion, Ph.D.

Dr. Campion is the Dow Chemical Company Professor of Chemistry at the University of Texas at Austin. From 1991 to 1995, he served as the Chairman of the University's Department of Chemistry and Biochemisty. Dr. Campion will testify to a reasonable degree of scientific certainty regarding the use of Raman spectroscopy to identify the presence of talc and other constituent elements found in talcum powder products in human tissue and other relevant topics relating to chemistry and Raman spectroscopy.

D. Daniel Clarke-Pearson, M.D.

Dr. Clarke-Pearson the Robert A. Ross Distinguished Professor and Chair of the Department of Obstetrics and Gynecology at the University of North Carolina at Chapel Hill. He is a clinician who specializes in Gynecologic Oncology. Dr. Clarke-Pearson is the former President of the Society of Gynecologic Oncologists and the recipient of several NIH and NCI grants. Dr. Clarke-Pearson will testify about gynecologic cancers generally, including the diagnosis, treatment, and natural course of ovarian cancer; the relationship between talcum powder use and

ovarian cancer, including causation; the biologic and molecular mechanisms involved in the development and progression of ovarian cancer; risk and protective factors for ovarian cancer; genetics relating to ovarian cancer; pathology of ovarian cancers; inflammation and its role in the development and progression of ovarian cancers; the body's response to talcum powder exposure; safer alternatives to talcum powder products; and other relevant topics in the field of gynecologic oncology. Dr. Clarke-Pearson is expected to testify to a reasonable degree of medical certainty that the genital use of talcum powder products is a cause of ovarian cancer.

E. Robert Cook, Ph.D.

Dr. Cook is Professor Emeritus in the Department of Geology and Geography at Auburn University. From 1984 to 2005 he served as the Head of Auburn's Department of Geology. Dr. Cook will testify to the natural formation of talc deposits, the presence of constituent materials in talc deposits (including asbestos, nickel, chromium, and other known carcinogens), the mineralogy of talc deposits, and the applicable mining, testing and processing standards for talc. Dr. Cook will testify that Defendants' failed to comply with applicable standards in relation to their talcum powder products.

F. Barbara S. Ducatman, M.D.

Dr. Ducatman is the Chief of Pathology and Laboratory Medicine Service Line at Beaumont Health, Chair of Pathology and Laboratory Medicine at Beaumont Hospital Royal Oak, Chair of the Department of Pathology at Oakland University William Beaumont School of Medicine and a Physician Executive for Beaumont Medical Group. Dr. Ducatman is certified by the American Board of Pathology in Anatomic Pathology and Clinical Pathology and Cytopathology. She has expertise in medicine and pathology, and specifically ovarian cancer pathology. Dr. Ducatman will offer opinions regarding the biology, pathology, and epidemiology

of ovarian cancer following the use of talcum powder products, and will testify to a reasonable degree of medical and scientific certainty that genital use of talcum powder products is a cause of ovarian cancer.

G. Thomas Dydek, Ph.D.

Dr. Dydek is a board certified toxicologist and licensed professional engineer. Dr. Dydek holds a BA in mechanical engineering and MS in Environmental Science and Engineering from Rice University. He received his doctorate in Environmental Science and Engineering from the University of North Carolina at Chapel Hill. Dr. Dydek completed a post-doctoral fellowship in toxicology at the University of Texas at Austin in the UT School of Pharmacy. Dr. Dydek will testify to the general properties of talcum powder, the plausible biologic mechanism of exposure and the development of ovarian cancer, toxic chemicals and the establishment of carcinogenesis generally, the relationship of talcum powder and other constituent elements (e.g. asbestos), causation from a toxicological standpoint, and other relevant topics in the field of toxicology. Dr. Dydek will testify to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

H. Guy Eslick, DrPH, Ph.D., FACE, FFPH

Dr. Eslick is a Professor of Cancer Epidemiology and Medical Statistics at the Sydney Medical School at the University of Sydney, Co-Director of the Whiteley-Martin Research Center at the Nepean Hospital, and Director of Research at Nepean Blue Mountains Local Health District. He recently published a meta-analysis on the association of perineal talcum powder usage and the development of ovarian cancer titled *Perineal talc use and ovarian cancer: A systematic review and meta-analysis*. Dr. Eslick is expected to provide testimony to a reasonable degree of scientific certainty that the genital use of talcum powder products increases the risk of ovarian cancer.

I. Dr. Soumitra Ghoshroy

Dr. Ghoshroy is an electron microscopist and professor of Biological Electron Microscopy at the University of South Carolina. He holds a Ph.D. in Biology and has worked since 1999 in research related to electron microscopy. Dr. Ghoshroy will testify regarding the use of Scanning Electron Microscope (SEM) and Transmission Electron Microscopy (TEM), to identify the presence of talc and other constituent elements found in talcum powder products in human tissue and other relevant topics related to spectroscopy.

J. Sander Greenland, Ph.D.

Dr. Greenland is Professor Emeritus of Epidemiology and Statistics at the UCLA School of Public Health, Department of Epidemiology. Dr. Greenland will offer opinions regarding testing methodologies and likely population exposure, including frequency and cumulative exposure, to asbestos and fibrous talc from the use of talcum powder products.

K. Robert Hamilton

Mr. Hamilton has a BS in Chemistry and a Masters in Theology. Mr. Hamilton is a former Director of Regulatory Liaison Operations at Amway where he was employed for 40 years . He will testify regarding the regulation of cosmetic products and other regulatory topics.

L. Anne Holland, CQA, CQE, CQM, RQAP-GLP

Ms. Holland is a certified quality engineer and CEO and Founder of QA Consulting in Austin, Texas. Ms. Holland holds a BS in Biomedical Engineering from the Vanderbilt University School of Engineering. Ms. Holland will testify regarding manufacturing, quality system regulations and remediation, good laboratory practice, risk management, and other relevant quality assurance issues relating to talcum powder products.

M. James Huff, Ph.D.

Dr. Huff is a pharmacologist and toxicologist, and previously served as the Deputy Director of the National Institute of Environmental Health Sciences (NIEHS) with the US Department of Health and Human Services (HHS). Dr. Huff was a professor of Pharmacology and Toxicology at the University of Rochester Medical School. He was Chief of the International Agency for Research on Cancer (IARC) Monographs Program on the Evaluation of Carcinogenic Risks to Humans and helped establish the carcinogenicity classification system. He helped create the National Toxicology Program (NTP) of NIEHS and prepared over 200 carcinogenesis bioassay technical reports during his tenure at the Institute. Dr. Huff helped established the NTP Report on Carcinogens. As part of his work with NIEHS and the NTP, Dr. Huff presented talc to be listed in the 10th Report on Carcinogens in 2000. Dr. Huff is expected to provide testimony to a reasonable degree of scientific certainty regarding the toxicological and causal effects of talcum powder products. In addition, he is expected to provide testimony regarding the study and listing of substances on the Report on Carcinogens, specifically as to the meeting in 2000 regarding talcum powder products.

N. Peter Infante, Ph.D.

Dr. Infante is an epidemiologist and public health scientist. Dr. Infante holds a D.D.S. degree from the Ohio State University and a Dr.P.H. from the University of Michigan, School of Public Health, Department of Epidemiology. Dr. Infante previously served as the Director of the Office of Standards Review, Health Standards Program, and Director of the Office of Carcinogen Identification and Classification at the Occupational Safety and Health Administration (OSHA). During his 24 years in OSHA, he played a major role in determining cancer and other risks to workers during the development of standards for a number of toxic substances, including asbestos,

arsenic, benzene, cadmium, ethylene oxide, formaldehyde, lead and MDA. He has served as an expert consultant in epidemiology for: the National Toxicology Program's (NTP) Report on Carcinogens (RoC); for Working Groups of the International Agency for Research on Cancer (IARC); the EPA Science Advisory Board (SAB) Chemical Assessment Advisory Committee; and as an expert on cancer risk from asbestos exposure for the World Trade Organization (WTO) in Geneva, Switzerland. He has testified before the U.S. Congress on numerous occasions about chemical pollution and the causes of cancer. Dr. Infante is expected to testify to a reasonable degree of scientific certainty regarding the causal effects of talcum powder products.

O. William Jameson, Ph.D.

Dr. Jameson is a chemist who previously worked for the National Cancer Institute, National Institutes of Health (NIH). He also served as Head of the Chemistry Section for the National Toxicology Program (NTP), National Institute of Environmental Health Sciences (NIEHS), NIH; Senior Chemist, Office of the Scientific Advisor to the Director NIEHS, NIH; and Director, Report on Carcinogens, NTP, NIEHS, NIH. Dr. Jameson served as Chairman of NIEHS/NTP Review Committee for the Report on Carcinogens (RoC) which included the review of non-asbestiform talc. In addition, Dr. Jameson served as the NIEHS representative to the World Health Organization's (WHO) IARC working group responsible for preparing Monograph Vol. 93, which involved non-asbestiform talc. Dr. Jameson is expected to testify to a reasonable degree of scientific certainty that talcum powder products is a cause of ovarian cancer. In addition, he is expected to provide testimony regarding the 10th RoC (NTP) review of non-asbestiform talc.

P. Sarah E. Kane, M.D.

Dr. Kane is certified by the American Board of Pathology in Anatomic Pathology, Clinical Pathology and Cytopathology. She has expertise in medicine and pathology, and specifically ovarian

cancer pathology. Following her medical school training and residency, she completed a two-year gynecologic and cytology fellowship as the Robert E. Scully Fellow in Pathology at Massachusetts General Hospital. Dr. Kane serves as Commonwealth Pathology Partners PC's gynecologic pathology expert. Dr. Kane will offer opinions regarding the biology, pathology, and epidemiology of ovarian cancer following the use of talcum powder products, and will testify to a reasonable degree of medical and scientific certainty that the perineal use of talcum powder products is a cause of ovarian cancer.

Q. David Kessler, M.D.

Dr. Kessler is currently Professor of Pediatrics, Epidemiology, and Biostatistics at the University of California, San Francisco. He is a former Commissioner of the United States Food and Drug Administration (FDA) (1990-1997) and Dean of the Yale University School of Medicine (1997-2003). Dr. Kessler will testify regarding regulation of cosmetic products, FDA's role in the evaluation of talcum powder products, and other relevant regulatory topics.

R. Dr. Mark P.S. Krekeler, Ph.D.

Dr. Krekeler is Associate Professor in the Department of Geology and Environmental Earth Science at Miami University in Oxford, Ohio. Dr. Krekeler will testify to the natural formation of talc deposits, the presence of constituent materials in talc deposits (including asbestos, nickel, chromium, and other known carcinogens), the mineralogy of relevant talc deposits, and the applicable mining, testing, and processing standards. Dr. Krekeler will also testify that Defendants failed to comply with applicable standards in relation to their talcum powder products.

S. Shawn Levy, Ph.D.

Dr. Levy is the Founding Director of the Genomic Services Lab and Faculty Investigator at the Hudson Alpha Institute for Biotechnology. Dr. Levy earned his doctorate in biochemistry at Emory University. He was an Assistant Research Professor at Vanderbilt University prior to

founding the Hudson Alpha Institute. Dr. Levy and Hudson Alpha are the recipients of numerous NIH grants for the study of genetics and genomics, and Dr. Levy's work in genetics and genomics has been published extensively in the scientific literature. Dr. Levy is expected to testify to a reasonable degree of scientific certainty that the genital use of talcum powder products is a biologically plausible cause of cellular injury and DNA damage that results in the initiation and proliferation of ovarian cancer.

T. William E. Longo, Ph.D.

Dr. Longo is material science and engineering expert. He is an expert in the areas of chemical analysis, materials characterizations, and testing methodologies and standards, including those related to talcum powder products. He is also an expert in optical and electrical microscopy, including technology and methods and standards relating to the identification and analysis of talcum powder products. Dr. Longo is an expert in the standards and definitions of talcum powder products related to human exposure and public health consequences. Dr. Longo is also an expert in the standards and methods for the analysis and testing of human tissue for the presence and identification of talc, asbestos, fibrous talc, and other constituent and related elements and fibers. Dr. Longo will testify in these areas as well as the interpretation and application of the results of the aforementioned testing.

U. Gerald Markowitz, Ph.D.

Dr. Markowitz is Distinguished Professor of History at John Jay College of Justice and the Graduate Center, City University of New York. He received his Doctorate from University of Wisconsin Department of History. He is the recipient of grants from private and federal agencies, and has co-authored and edited books and articles on occupational safety and health involving

unsafe substances and products. Dr. Markowitz will testify that Defendants breached applicable standards related to talcum powder products.

V. Anne McTiernan, M.D., Ph.D.

Dr. McTiernan is a Full Member in the Fred Hutchinson Cancer Research Center Division of Public Health Sciences and former Director of its Prevention Center. She is also a Research Professor, Department of Epidemiology at the University of Washington School of Public Health and Department of Medicine (Geriatrics) at the University of Washington, School of Medicine. She is a medical doctor (internal medicine) and epidemiologist. She has multiple honors and publications in the area of women's public health. Dr. McTiernan worked on the design of the Women's Health Initiative clinical trials and observational study, and has written extensively on cancer epidemiology and cancer prevention. Dr. McTiernan will provide expert testimony to a reasonable degree of medical and scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

W. Jacqueline Moline, M.D, M.Sc.

Dr. Moline is the Chair of the Occupational Medicine, Epidemiology and Prevention at the Zucker School of Medicine, Hofstra University. She is an expert in the fields of internal and occupational medicine, public health, epidemiology, and the clinical practice of medicine. Dr. Moline will testify about ovarian cancers generally, the causes of cancer (including talcum powder products), cancer diagnosis, cancer effects, cancer treatments, the clinical course of cancer treatment, as well as the associated pain and suffering from cancer. Dr. Moline is expected to provide testimony to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

X. Bradley Monk, M.D., FACOG, FACS

Dr. Monk is a Professor and Director of the Division of Gynecologic Oncology at Creighton University School of Medicine at St. Joseph's Hospital and Medical Center, Phoenix, AZ. Dr. Monk is a clinician in the area of gynecologic oncology and immunotherapy. He is the recipient of numerous grants for research in gynecologic cancers. He is expected to offer opinions in the following areas: gynecologic oncology generally; the role of the immune system in cancer initiation and progression; natural cellular repair mechanisms and physiological response to damage; and, the initiation and progression of gynecologic cancers at both the cellular and gross anatomical level, including ovarian and fallopian tube cancers, their etiology and biomarkers and cellular and tumor microenvironment. Dr. Monk will testify to a reasonable degree of medical certainty that the genital use of talcum powder products is a cause of ovarian cancer.

Y. Patricia Moorman, M.S.P.H, Ph.D.

Dr. Moorman is the Clinical Research Unit Director for the Department of Community and Family Medicine at Duke University and an adjunct professor of epidemiology at the University of North Carolina, Chapel Hill. Dr. Moorman is and has been the principal investigator of a number of ovarian cancer studies. Most recently, she co-authored a meta-analysis review of the current medical literature regarding perineal talcum powder usage and the development of ovarian cancer titled *Association between Body Powder Use and Ovarian Cancer: The African American Cancer Epidemiology Study (AACES)*. Dr. Moorman will provide testimony to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

Z. Laura M. Plunkett, Ph.D., D.A.B.T.

Dr. Plunkett is a pharmacologist, toxicologist, and U.S. Food and Drug Administration (FDA) regulatory specialist. She is board-certified as a Diplomate of the American Board of

Toxicology with decades of experience in the areas of pharmacology and toxicology, and is a registered patent agent. She has worked in academic research, teaching pharmacology and toxicology at both the undergraduate and postgraduate levels. She has worked with clients in risk assessment, product development, and post-market assessments. Dr. Plunkett will testify to a reasonable degree of scientific certainty: (1) that the use of talcum powder in cosmetic products does not meet regulatory or industry standards of safety; (2) that talcum powder products used for genital dusting should have been labeled to warn of the risk of ovarian cancer; and, (3) the biologically plausible mechanisms by which talcum powder products cause ovarian cancer. Dr. Plunkett will provide testimony to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

AA. Mark Rigler, Ph.D.

Dr. Rigler is an expert in bioanalytical chemistry and microbiology. He is an expert in the areas of chemical analysis, materials characterizations, and testing methodologies and standards, including those related to talcum powder products. He is also an expert in optical and electrical microscopy, including technology and methods and standards relating to the identification and analysis of talcum powder products. Dr. Rigler will testify regarding the standards and definitions of talcum powder products relating to human exposure and public health consequences. Dr. Rigler will also testify regarding the standards and methods for the analysis and testing of human tissue for the presence and identification of talc, asbestos, fibrous talc, and other constituent and related elements and fibers. He will further testify as to the interpretation and application of the results of the aforementioned testing.

BB. David Rosner, Ph.D.

Dr. Rosner is the Ronald H. Lauterstein Professor of Socio-Medical Sciences and Professor of History in the Graduate School of Arts and Sciences at Columbia University. He is also Co-Director of the Center for the History and Ethics of Public Health at Columbia's Mailman School of Public Health. Dr. Rosner holds a Master of Science in Public Health (M.S.P.H.) from the University of Massachusetts and received his Ph.D. from Harvard University. Dr. Rosner will testify that Defendants breached applicable standards related to talcum powder products.

CC. Ghassan Saed, Ph.D.

Dr. Saed is Associate Professor of Obstetrics and Gynecology, Anatomy and Cell Biology and the Director of Ovarian Cancer Biology Research at Wayne State University. Dr. Saed will testify regarding the role of inflammation and oxidative stress in the pathogenesis of ovarian cancer, the causal link between talcum powder products and the development and progression of epithelial ovarian cancer, biomarkers for ovarian cancer, genetic mutations and ovarian cancer, and other relevant topics in the field of molecular cancer biology. Dr. Saed will testify to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

DD. Jack Siemiatycki, MSc, Ph.D., FCAHS

Dr. Siemiatycki is a tenured Professor of Epidemiology at the University of Montreal, an adjunct Professor of Epidemiology at McGill University in Montreal, and the current Cancer Research Society-Guzzo Research Chair in Environment and Cancer at the University of Montreal. He is trained in statistics and epidemiology. He has devoted the majority of his research career to investigating the association between environmental, occupational, and lifestyle factors with various types of cancer. He has participated in and chaired numerous meetings of IARC to evaluate the carcinogenicity of substances. Dr. Siemiatycki chaired the 2006 IARC Working Group on the

Evaluation of Carcinogenic Risks to Humans, which evaluated carbon black, titanium dioxide, and talc. Dr. Siemiatycki will provide testimony to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

EE. Sonal Singh, M.D., MPH

Dr. Singh, M.D., MPH is an Associate Professor at the University of Massachusetts Medical School in the Department of Family Medicine and Community Health. Dr. Singh is a Johns Hopkins, Bloomberg School of Public Health, trained epidemiologist. He was the Associate Director for the Center for Drug Safety and Effectiveness and core faculty at the Evidence-Based Practice Center and the Center for Public Health and Human Rights at Johns Hopkins University. His research has been supported by the NIH, FDA, Agency for Health Care Research and Quality and the Patient Centered Outcome Institute. He has served as a consultant to the World Bank and is a consultant to IARC and the Agency for Health Care Research and Quality. Dr. Singh will provide testimony to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

FF. Ellen Blair Smith, M.D.

Dr. Smith is a physician specializing in Gynecologic Oncology, Hospice, and Palliative Medicine. She is currently Medical Director of Halcyon Hospice in Austin, Texas. She graduated from the University of North Carolina, School of Medicine and completed a residency in Gynecologic Oncology at Duke University. Dr. Smith served as an Associate Professor of Medicine at the University of Virginia prior to going into private practice. Dr. Smith will testify about: gynecologic cancers generally, including the diagnosis, treatment, and natural course of ovarian cancer; the relationship between talcum powder use and ovarian cancer, including causation; the biologic and molecular mechanisms involved in the development and progression

of ovarian cancer; risk and protective factors for ovarian cancer; genetics relating to ovarian cancer; pathology of ovarian cancers; inflammation and its role in the development and progression of ovarian cancers; the body's response to talcum powder exposure; safer alternatives to talcum powder products; and, other relevant topics in the field of gynecologic oncology. Dr. Smith will testify to a reasonable degree of medical certainty that the genital use of talcum powder products is a cause of ovarian cancer.

GG. Martyn Thomas Smith, Ph.D.

Dr. Smith is a Professor of Toxicology (Kenneth Howard and Marjorie Witherspoon Kaiser Endowed Chair in Cancer Epidemiology) at the University of California at Berkeley School of Public Health. Dr. Smith has expertise and a broad background in molecular epidemiology, toxicology and genomics, aimed at finding the causes of chronic disease, including cancer. He led the Superfund Research Program at Berkeley since its inception in 1987. This program has been peer-reviewed and renewed 5 times. The overall goals of the Program include improving our understanding of the relationship between exposure and disease. Dr. Smith will offer opinions in the talcum powder litigation pertaining to the shared characteristics of carcinogens, and may address other general causation issues.

HH. Rebecca Smith-Bindman, M.D.

Dr. Smith-Bindman is a Professor of Radiology and Biomedical Imaging, Epidemiology and Biostatistics, Obstetrics, Gynecology and Reproductive Medicine at the University of California, San Francisco where she also serves as the Director of the Radiology Outcomes Research Lab. She has experience in multiple areas, including epidemiology, biostatistics, and gynecology. She will offer opinions in the area of epidemiology as it relates to the development of ovarian cancer following talcum powder use. Dr. Smith-Bindman will testify to a reasonable

degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

II. Robert Soller, Ph.D.

Dr. Soller is the President of Biomedical Regulatory Consulting, a company specializing in the field of regulatory program management as well as the development and assessment of quality management systems relating to FDA-regulated products. He holds a Ph.D. in Medical Sciences from Weill Cornell Graduate School of Medical Sciences at Cornell University and has completed post-doctorate work in pharmacology and other related areas. Dr. Soller is expected to provide expert regulatory testimony pertaining to the duties and practices for the production and maintenance of safe cosmetic products, including the development, testing, labeling and monitoring of cosmetic products.

JJ. Judy K. Wolf, M.D.

Dr. Wolf is the Chief Medical Officer at ProvistaDX. She is a physician who specializes in Gynecologic Oncology. She previously served as the Division Chief of Surgery at the Banner MD Anderson Cancer Center in Phoenix, Arizona, and as a member of the faculty at The University of Texas MD Anderson Cancer Center in Houston, Texas. She also served as Co-Division Director, Department of Gynecologic Oncology, Division of Surgery, Baylor College of Medicine. Dr. Wolf will testify about: gynecologic cancers generally, including the diagnosis, treatment, and natural course of ovarian cancer; the relationship between talcum powder use and ovarian cancer, including causation; the biologic and molecular mechanisms involved in the development and progression of ovarian cancer; risk and protective factors for ovarian cancer; genetics relating to ovarian cancer; pathology of ovarian cancers; inflammation and its role in the development and progression of ovarian cancers; the body's response to talcum powder exposure; safer

alternatives to talcum powder products; and other relevant topics in the field of gynecologic oncology. Dr. Wolf will testify to a reasonable degree of medical certainty that the genital use of talcum powder products is a cause of ovarian cancer.

KK. Judith Zelikoff, Ph.D.

Dr. Zelikoff is a Professor of Environmental Medicine at the New York University School of Medicine. She will offer opinions in the areas of toxicology and immunotoxicology generally, physiological response mechanisms (including that of the immune system) initiated by cellular and systemic exposure to carcinogens, irritants and toxic particles, and provide an assessment of human health risks, such as carcinogenicity and tumorigenicity, based on the biological effects of foreign agents. Dr. Zelikoff will testify to a reasonable degree of scientific certainty that the genital use of talcum powder products is a cause of ovarian cancer.

* * *

Respectfully Submitted,

s/Michelle A. Parfitt
Michelle A. Parfitt
ASHCRAFT & GEREL, LLP
4900 Seminary Road, Suite 650
Alexandria, VA 22311
Telephone: 703-931-5500
Email: mparfitt@ashcraftlaw.com

s/P. Leigh O'Dell
P. Leigh O'Dell
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
218 Commerce Street
Montgomery, Alabama 36104
Telephone: 334-269-2343
Email: leigh.odell@beasleyallen.com

s/Christopher M. Placitella

Christopher M. Placitella
COHEN PLACITELLA ROTH, PC
127 Maple Avenue
Red Bank, NJ 07701
Telephone 888-219-3599
Facsimile: 215-567-6019
Email: cplacitella@cprlaw.com